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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

J.D.H., a minor by and through her legal
guardian and/or parent, Inocente Dominguez; and
MARIA HERNANDEZ, an individual,

Case No.: 2:13-CV-01300-APG-NJK

Plaintiffs,

VS.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; LAS VEGAS
METROPOLITAN POLICE DEPARTMENT
OFFICER J. BARKER (in his individual
capacity); and LAS VEGAS METROPOLITAN
POLICE DEPARTMENT OFFICER M.
PURCARO (in his individual capacity).

Defendants.

**STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS TO FILE
THEIR REPLY IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT
(First Request)**

Pursuant to LR-6-1, the parties hereby stipulate, agree, and make joint application to
extend the deadline for Defendants to file their reply in support of their motion for summary
judgment [Dkt. #99] in this matter as follows:

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1 1. The Deadline for the Defendants to submit their reply in support of their motion
2 for summary judgment is presently set for February 18, 2016.

3 2. Defendants' counsel, Mr. Christian Balducci, reached out to Plaintiffs' counsel on
4 February 16, 2016 via email, and not long after sending the email and out of an abundance of
5 caution, filed a motion to enlarge/extend time to file the reply in support of the motion for
6 summary judgment on an emergency basis. That motion is presently pending as [Dkt. #112]
7 ("the Motion").

8 3. In the Motion, Defendants requested an additional 7 calendar days to file their
9 reply due to the items raised in the motion and opposition, namely, the busy schedule of Mr.
10 Balducci (counsel for Defendants), which includes a trial and arbitration, and the lengths of the
11 pleadings.

12 4. Defendants' counsel and Plaintiffs' counsel were able to speak after the motion
13 was filed.

14 5. Plaintiffs' counsel, Ms. Shell, was able to contact Defendants' counsel later that
15 day and respectfully indicated she had no opposition; which would render the motion to enlarge
16 time [Dkt. #112] moot and warrant that it be denied as such in light of this stipulation.

17 6. Based upon the foregoing, the parties respectfully request that the Court order:

- 18 a. That the time for Defendants' reply in support of their motion for
19 summary judgment be extended from February 18, 2016 to February 25,
20 2016; and
21 b. That Defendants' emergency motion to enlarge/extend time to file reply in
22 support of their motion for summary judgment [Dkt. #112] be denied as
23 moot upon execution by the Court of this stipulation.

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1 7. This is the first joint, stipulated request for enlargement of time for Defendants'
2 reply and is made in good faith and not for the purpose of delay.

3 Dated this 16th day of February, 2016.

Dated this 16th day of February, 2016.

4 MARQUIS AURBACH COFFING

MCLEATCHIE SHELL, LLC

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13 **ORDER**

14 IT IS ORDERED that Defendants' reply in support of their motion for summary
15 judgment [Dkt. #99] in the above-referenced matter is extended to **Thursday February 25,**
16 **2016;**

17 IT IS FURTHER ORDERED that the Defendants' emergency motion to enlarge/extend
18 time pending as [Dkt. #112] be denied as moot as this Stipulation and Order grants the relief
19 sought.

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21 February 17, 2016

22 DATED

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UNITED STATES DISTRICT COURT JUDGE